

Levin-Richmond Terminal Corporation

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February 18, 1997

Mr. Dick Vesperman
EPA Project Coordinator
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: United Heckathorn Superfund Site Work Plan - Completion of Dredging in the Lauritzen Channel

Dear Mr. Vesperman:

Levin-Richmond Terminal Corporation has reviewed the Partial Post-Dredge Survey of the Lauritzen Channel as of January 31, 1997. Our understanding of the channel cleanup has always been based on having a berth dredged clear of Young Bay Mud (YBM) to a depth of -41 feet. The survey clearly shows that the berth has not been dredged to -41 feet. The Work Plan specifies that dredging will be to the toe of the slope which is within 10 feet, plus or minus 2 feet, of the dock. According to the Work Plan:

6.6 Sloping Embankments Along the Channel

The banks will be sloped at 3 horizontal to 1 vertical angle. Dredging along the shoreline will be within 10 feet, plus or minus 2 feet, of the toe of the slope. Dredging will not take place directly adjacent to pilings or under structures. After sloping is completed, clean rock to provide bank stabilization and clean sand, totaling an average of 18" thick, will be placed as outlined in Section 6.12 below. See Dredge Plan (Appendix A) for further details of the dredging procedures.

To compare the Work Plan Appendix A and the Channel Cross Sections (Exhibit #3) with the depths indicated on the PLS survey dated January 31, 1997, we have used CAD drawings to superimpose both documents on the attached cross sectional drawings (LRT Attachment #A). We have plotted each 50 ft. interval to get a better understanding of the depth of the remaining material to be removed according to the Work Plan, and have included them for your review and response. Also included are copies of the core samples taken by Battelle indicating the depth of the YBM/OBM interface. We don't have access to the samples used to map the interface, however, the depth appears to be

between -40.7 ft. and -42.6 ft.. If the toe of the slope is 10 ft. plus or minus 2 ft. from the face of the dock, the resulting elevations, along with a section at 8+00, are shown in LRT Attachment B.

From these observations it is clear that the Work Plan depths have not been achieved. There are discrepancies from 2 ft. to over 10 ft. of YBM containing contaminated materials that have not been dredged. Note on section 9+00 that the Battelle core sample LZ-10 indicates the YBM/OBM interface at -40.7 ft. and that the plan depth is shown at -41 ft., but the dredged depth, as shown, is approximately 15 ft. shallower. (See the included grid map for Battelle core sample locations and depths, LRT Attachment C.) The depths indicated in the Work Plan should be the guideline to assure that all of the dredgable contaminated material has been removed. As the site owners we want to insure that all of the contamination required to be removed by the Montrose Consent Decree and Work Plan have been removed.

We also note that Channel Cross Sections (Exhibit #3) Sections 0+00 through 1+50 extend beyond the silt curtain. Will these grids be completed when the silt curtain is removed? Please see Channel Cross Sections (Exhibit #3) NOTE: **"NO DATA POINTS WERE PROBED FOR STATIONS 0+50 TO 1+50 WHICH COVER 1.75 GRIDS. THOSE GRIDS WILL BE DREDGED TO -41 FEET (PLUS 6" OVERDREDGE), CONSISTENT WITH ADJACENT GRIDS."**

It is possible that in order to make "B" berth useful for loading and unloading deep draft vessels, additional dredging may be required by LRTC.

LRTC requests that EPA insure that Montrose Chemical has completed the work required by the Work Plan prior to EPA releasing Waste Management, Inc. (WMI) from the site. LRTC plans to engage WMI and their subcontractors for dredging and dewatering of any additional material required for the use of berth "B" following the completion of their work. We want to be sure that all of the contaminated Young Bay Mud as specified in the Work Plan is removed by WMI prior to any additional work on berth "B".

LRTC also requests to have representatives present during meetings that are for the purpose of reviewing and determining the completion of dredging. Please contact me if you have any questions regarding this matter.

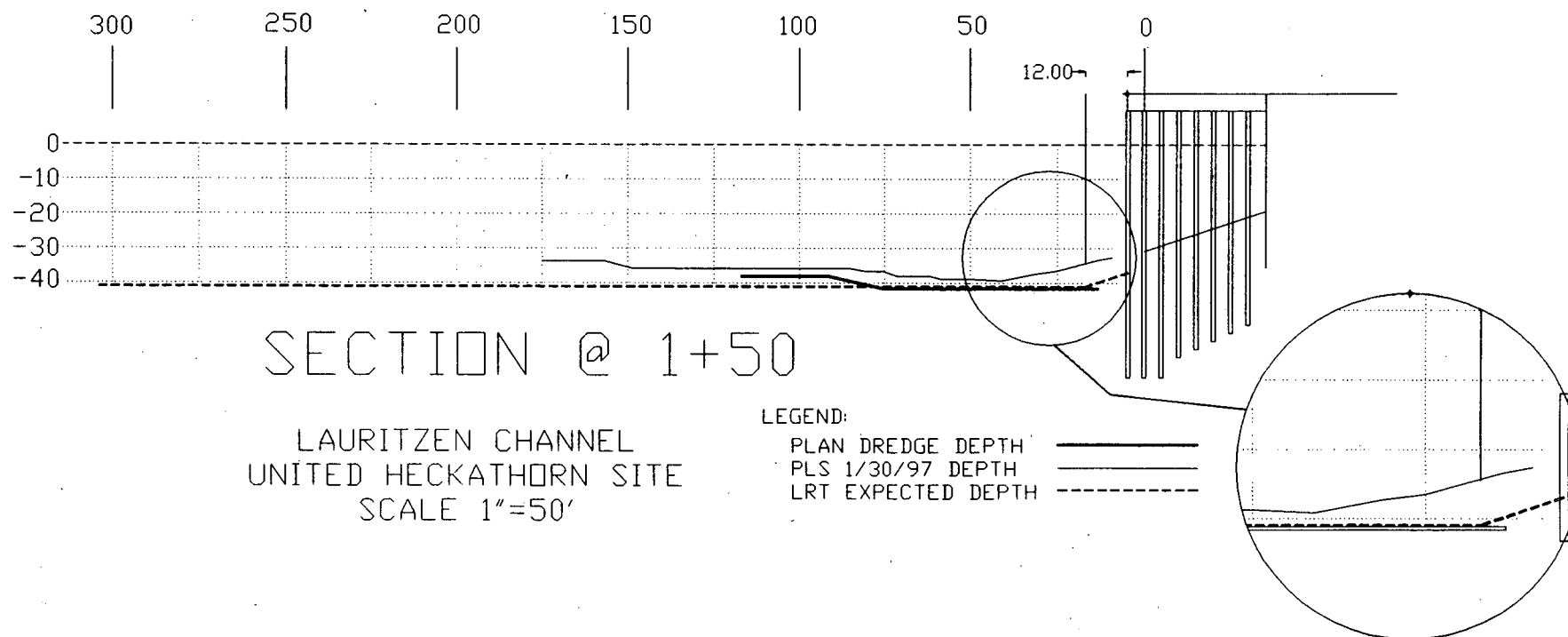
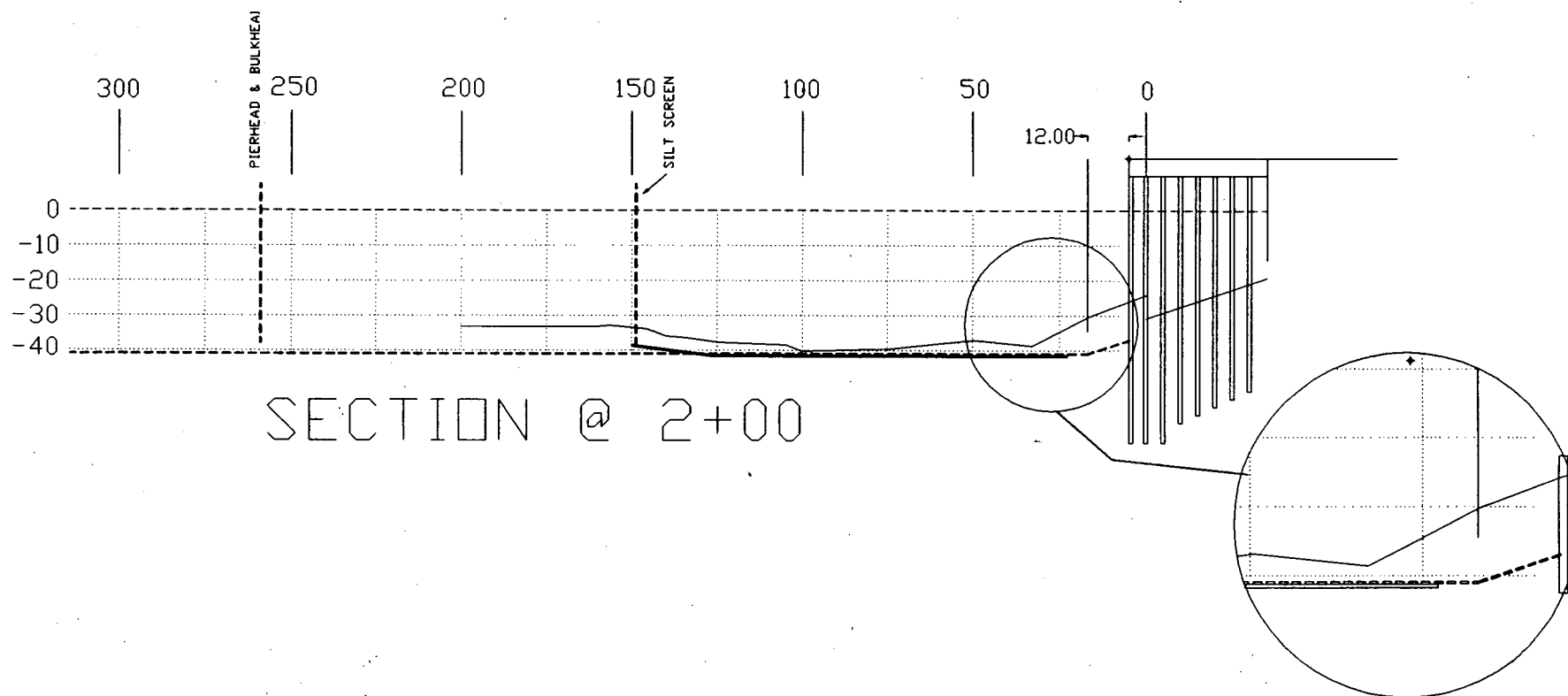
Regards,

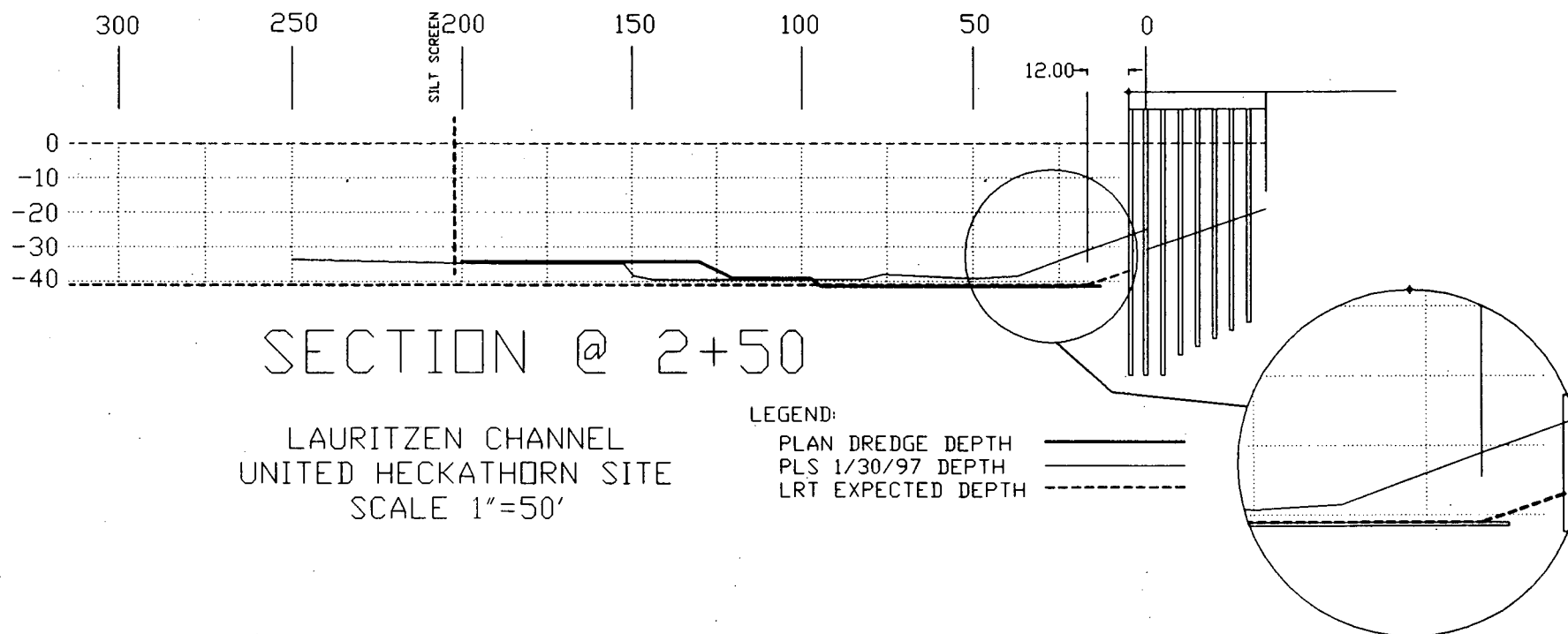
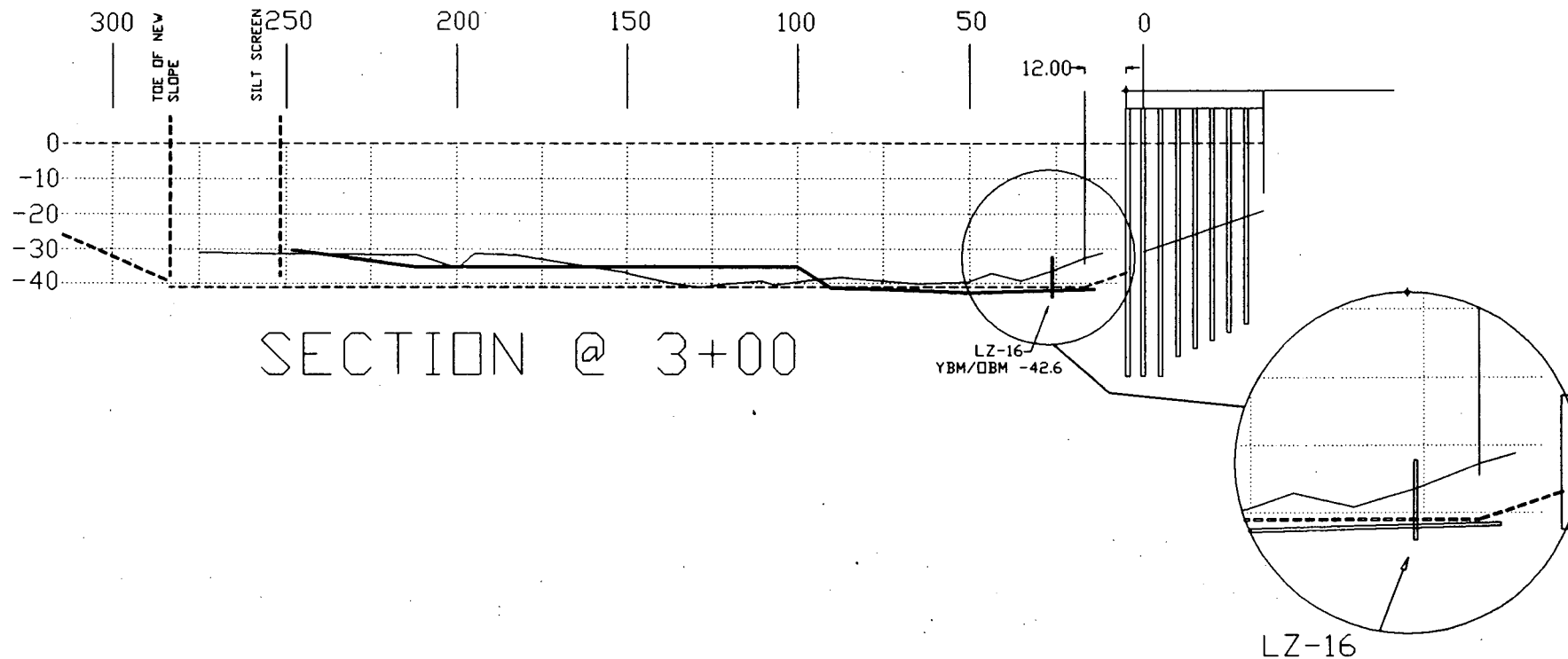


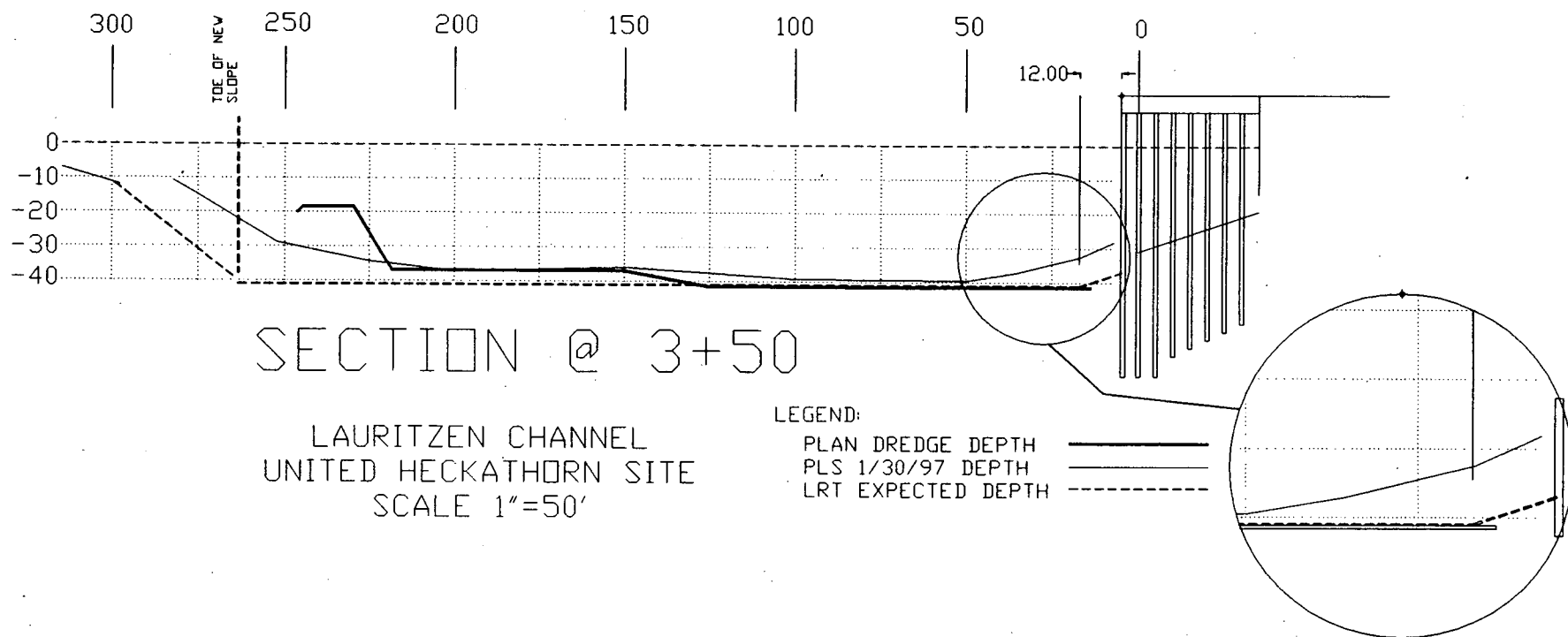
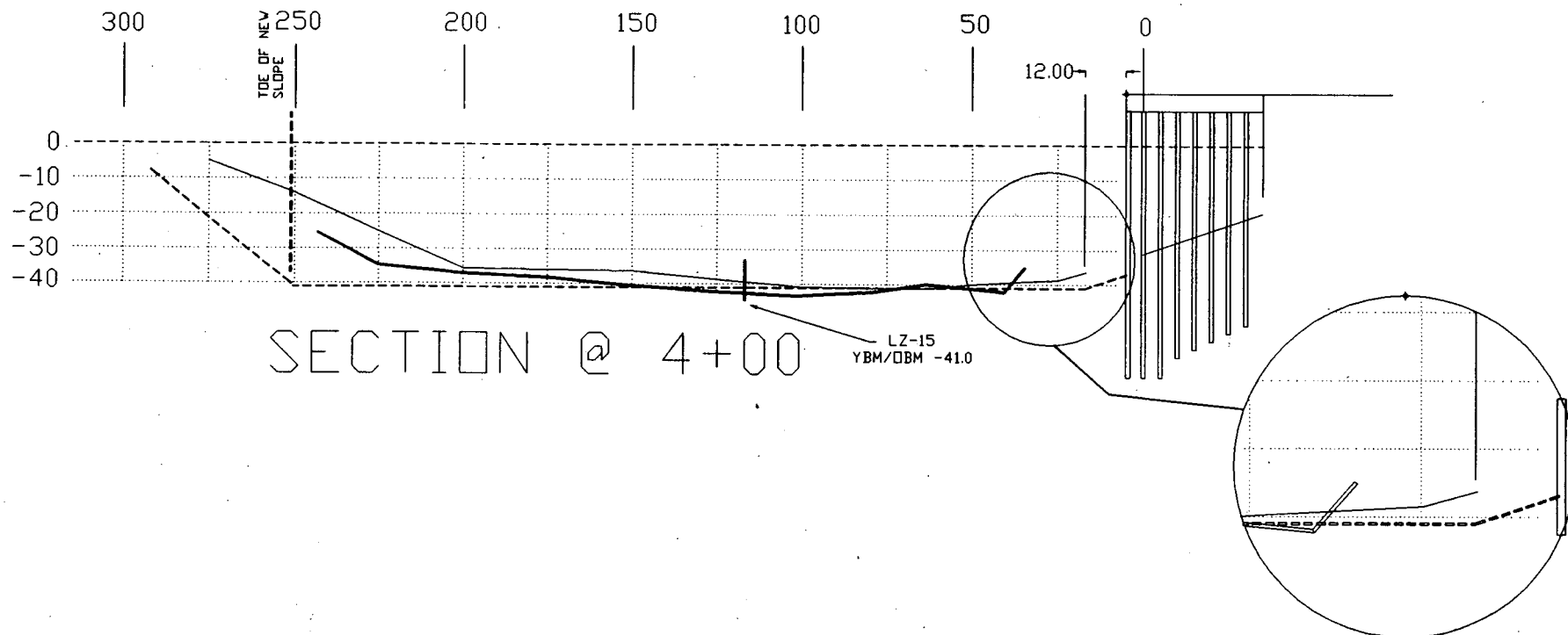
Mike McCoy
Project Coordinator

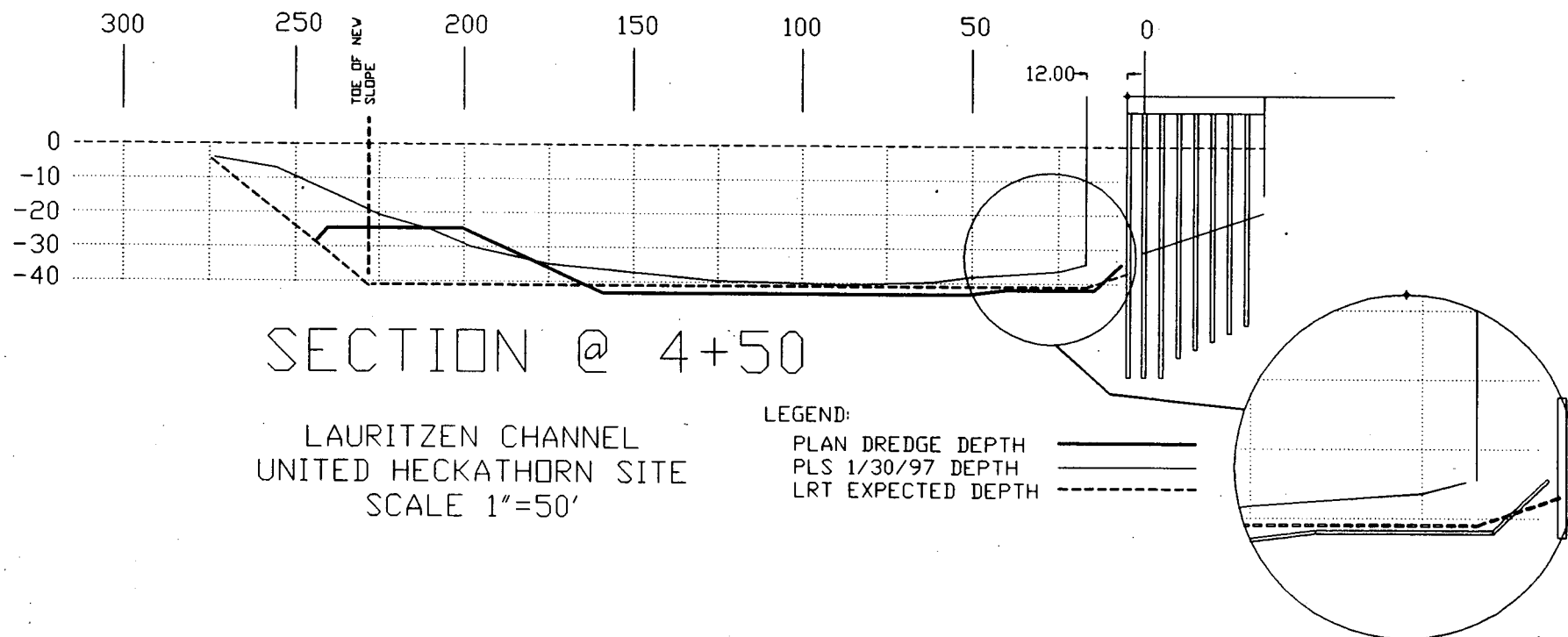
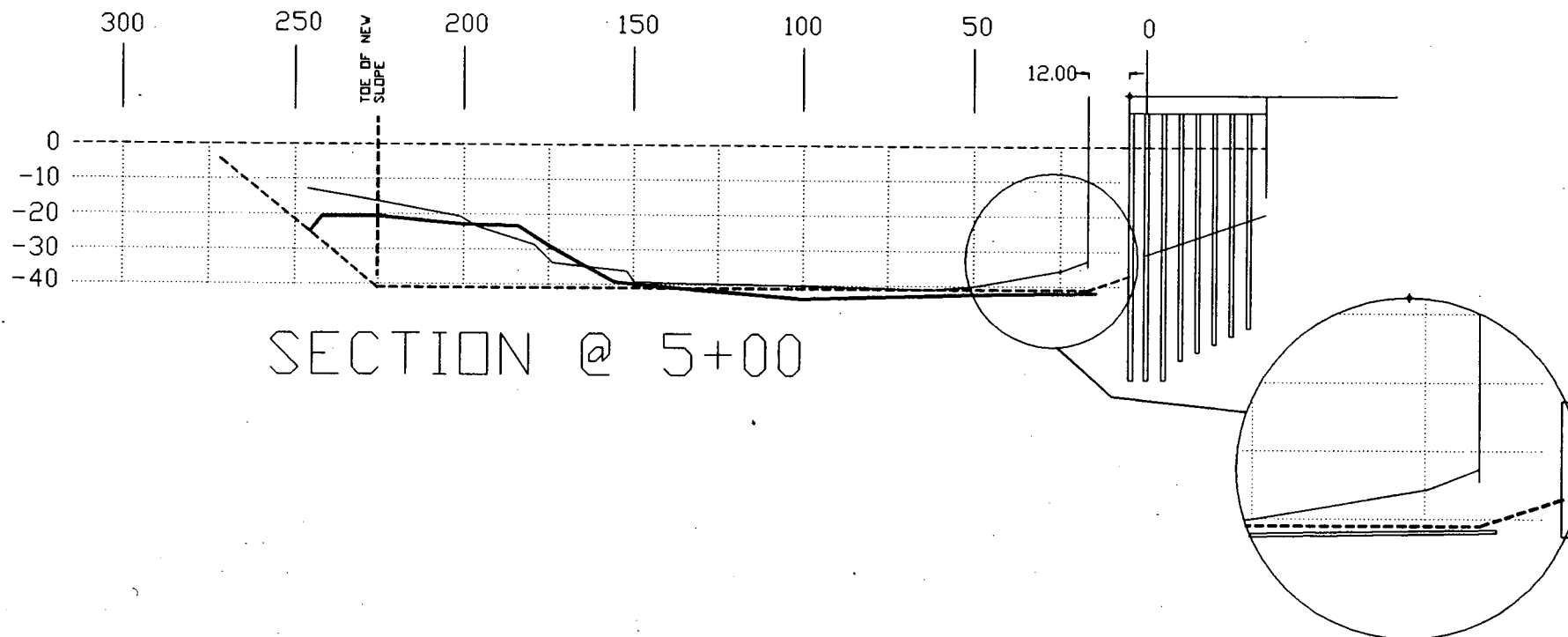
cc: Bill Benak
Keith Howard

ATTACHMENT “A”





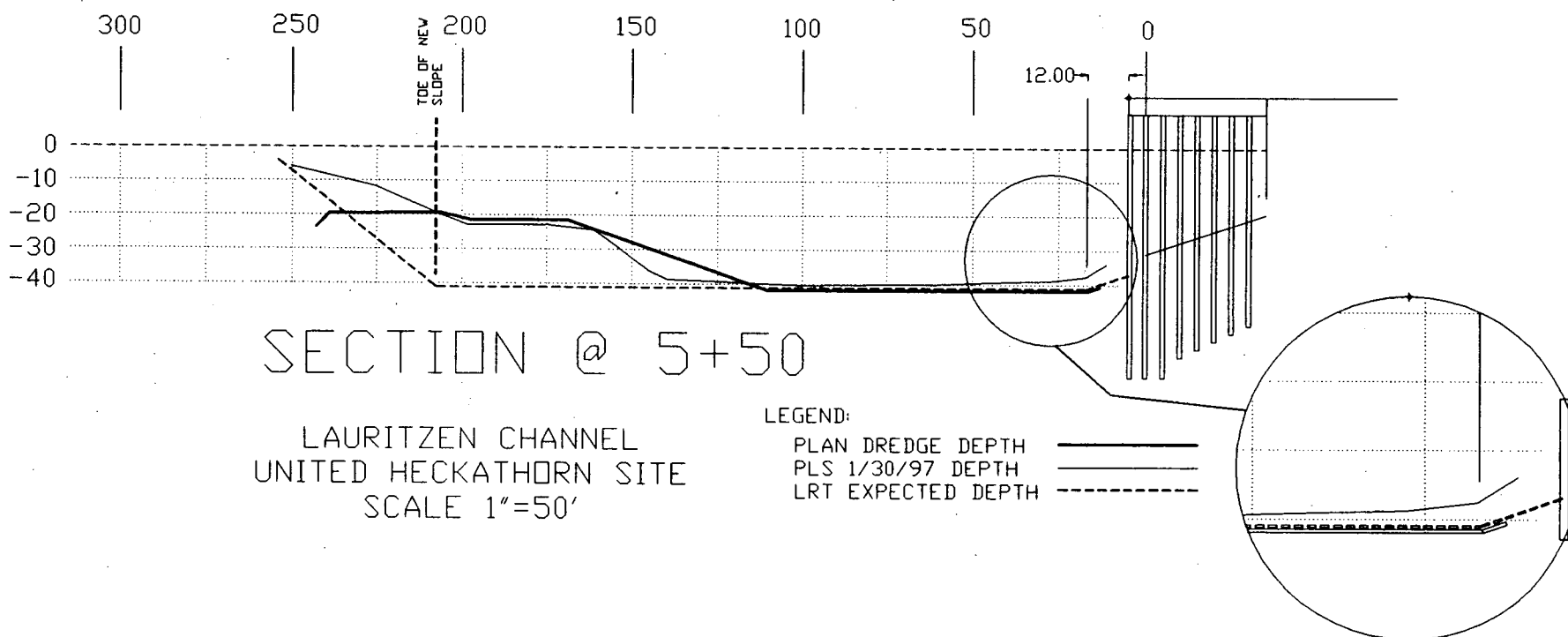
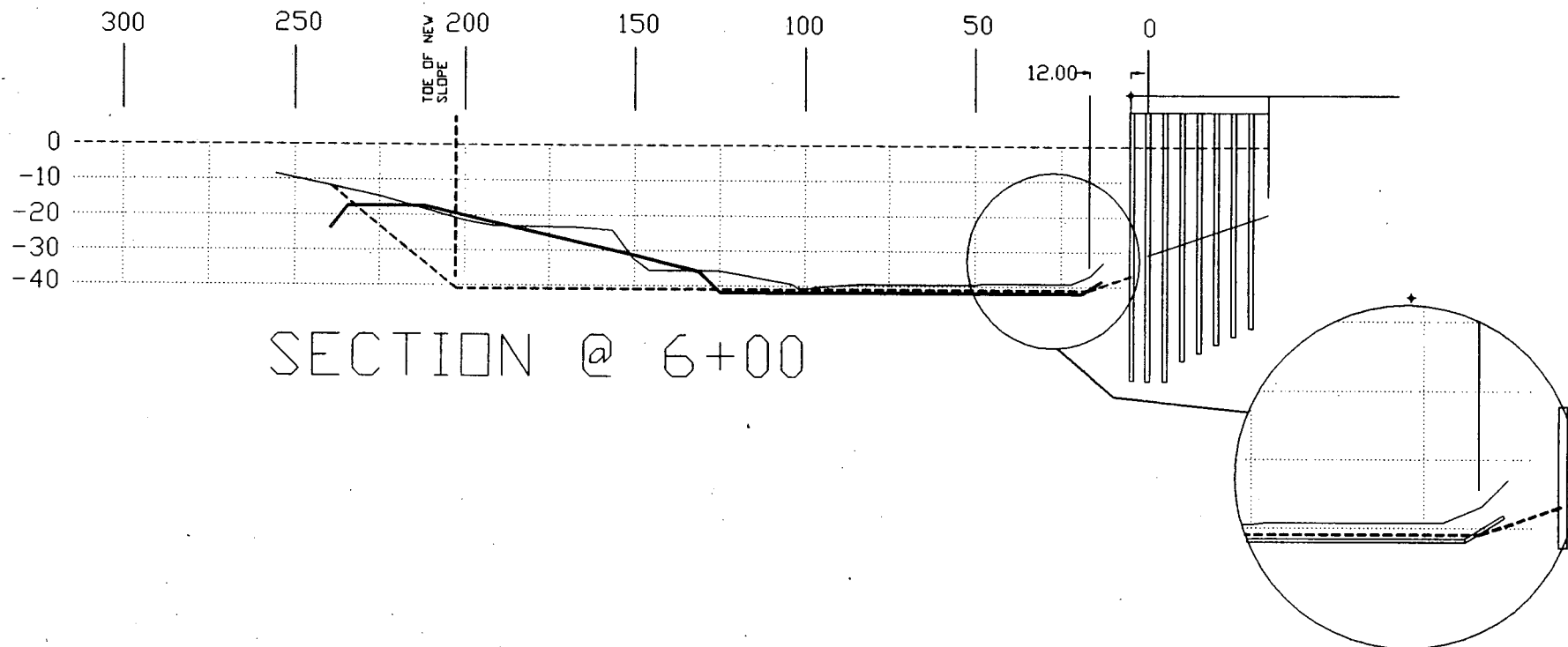


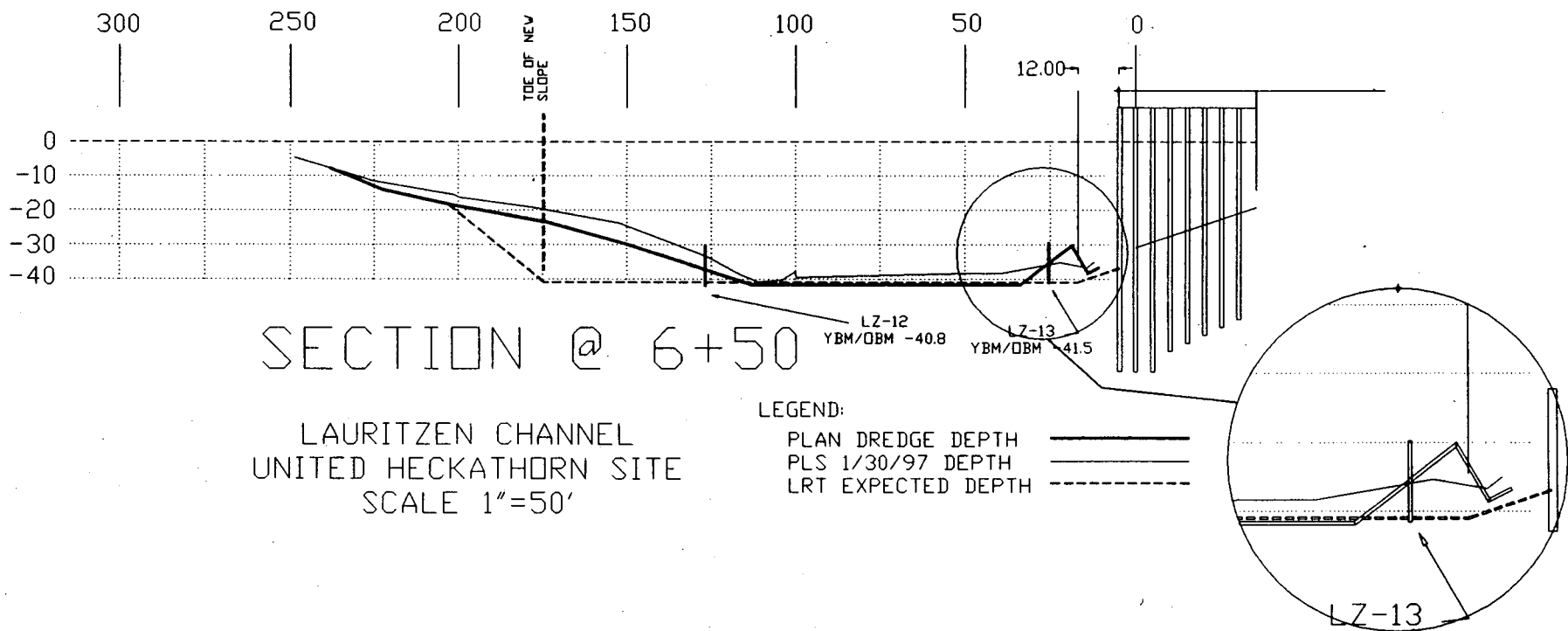
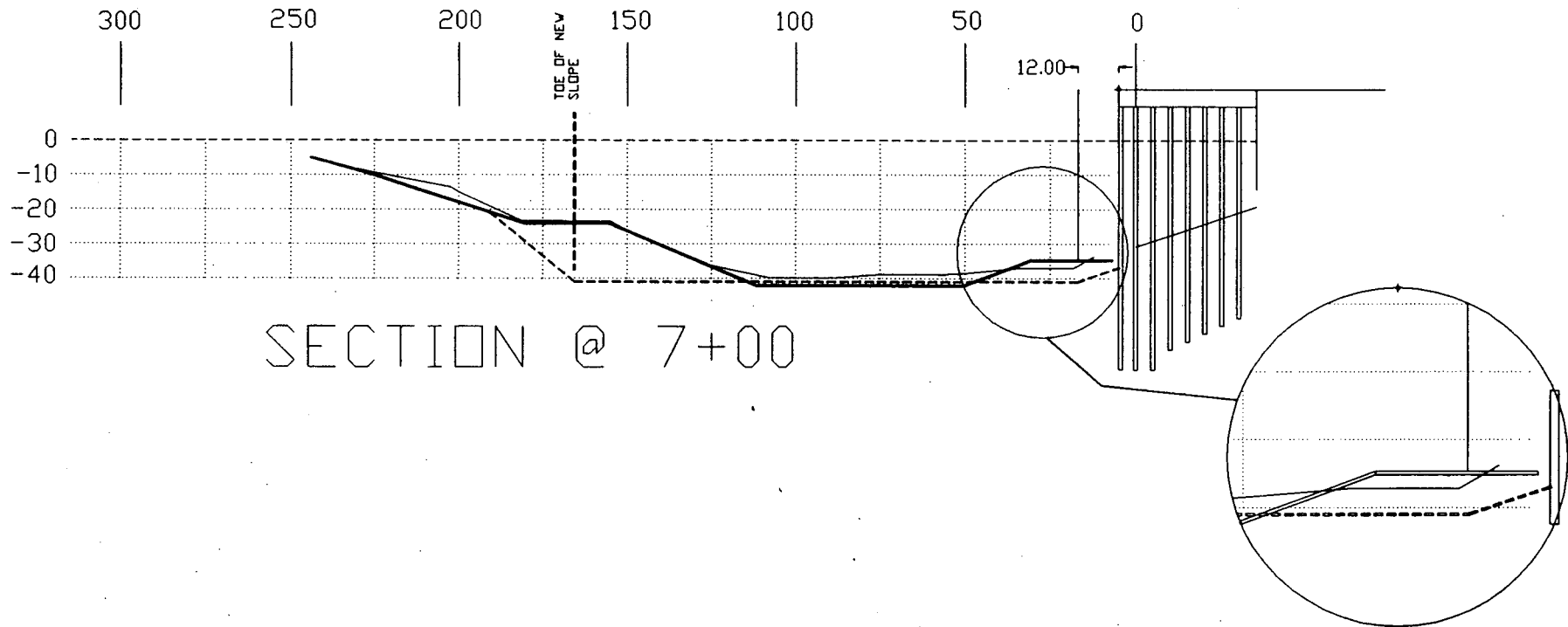


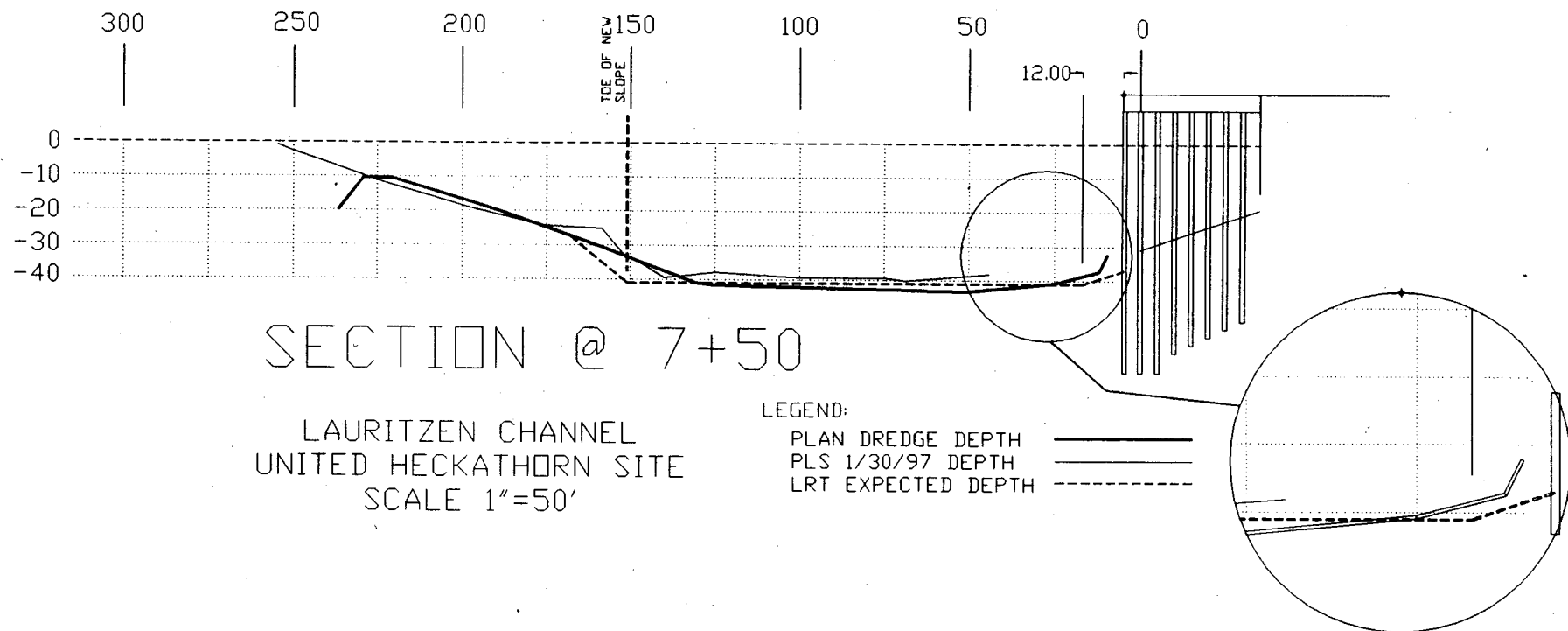
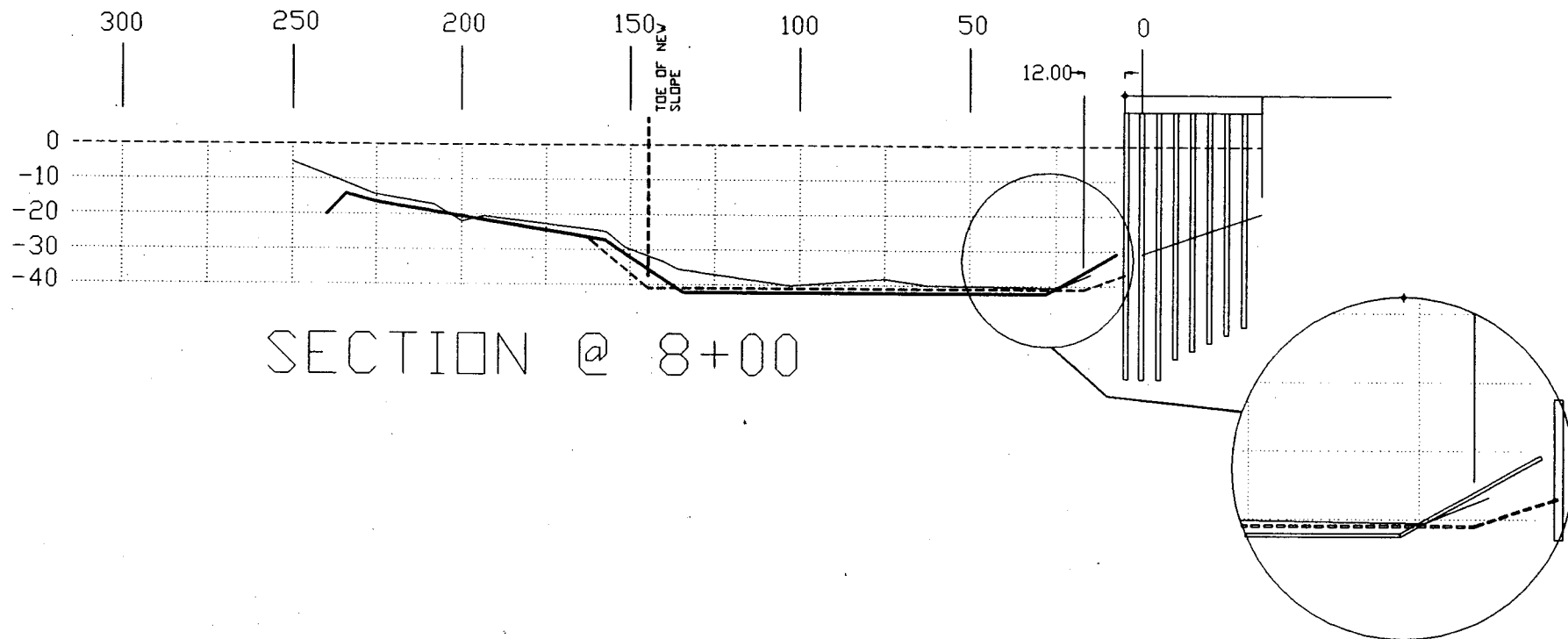
LAURITZEN CHANNEL
UNITED HECKATHORN SITE
SCALE 1"=50'

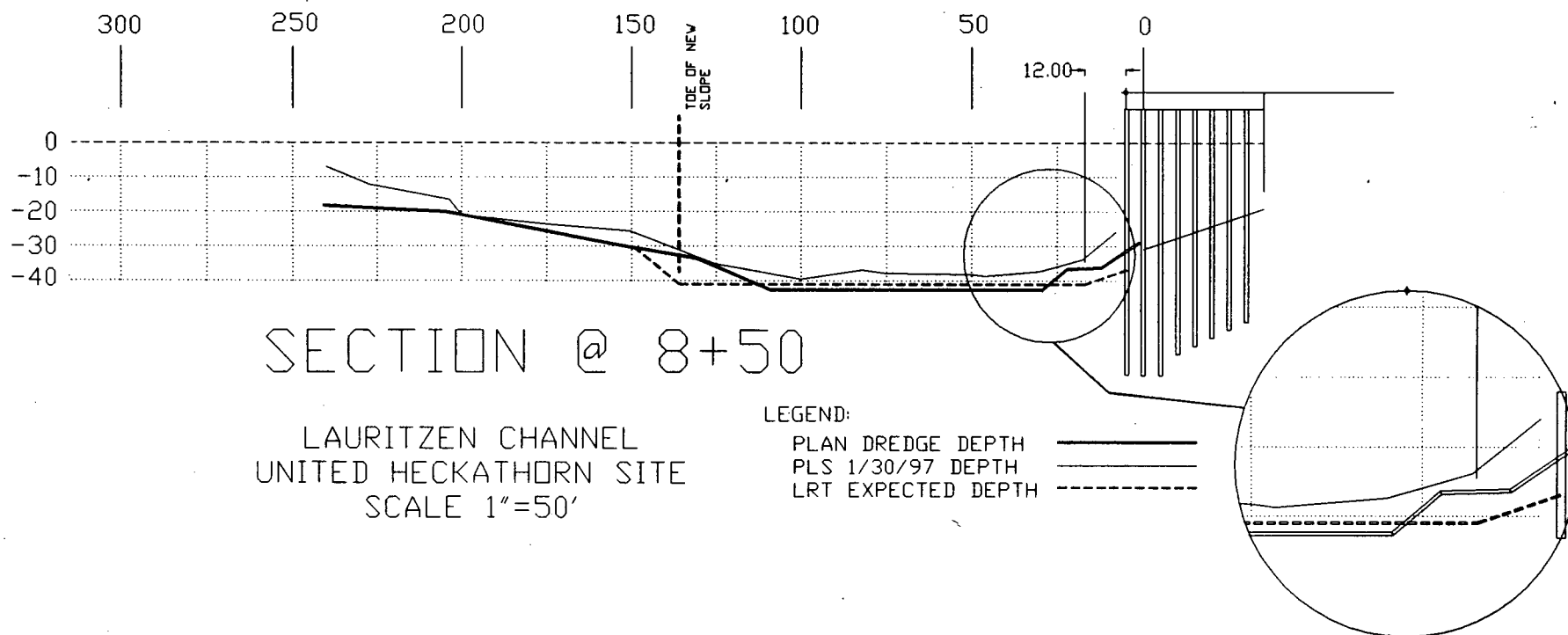
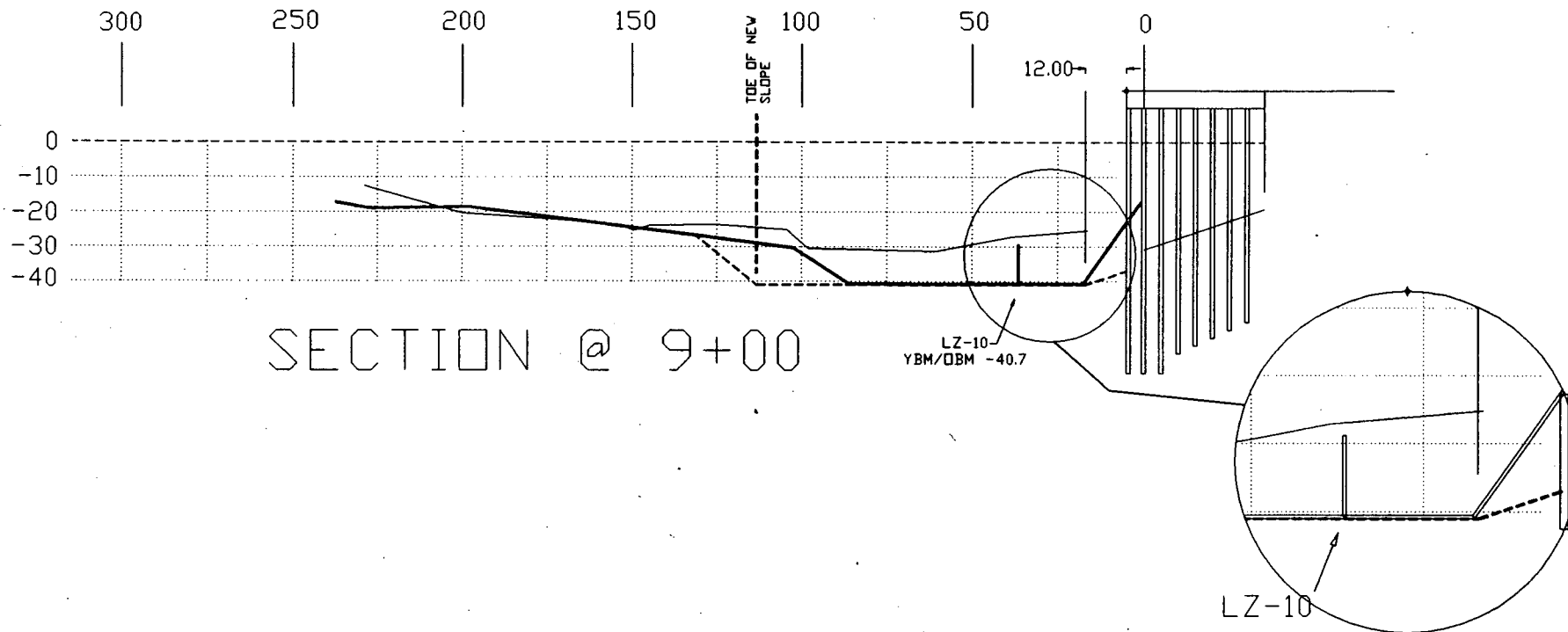
LEGEND:

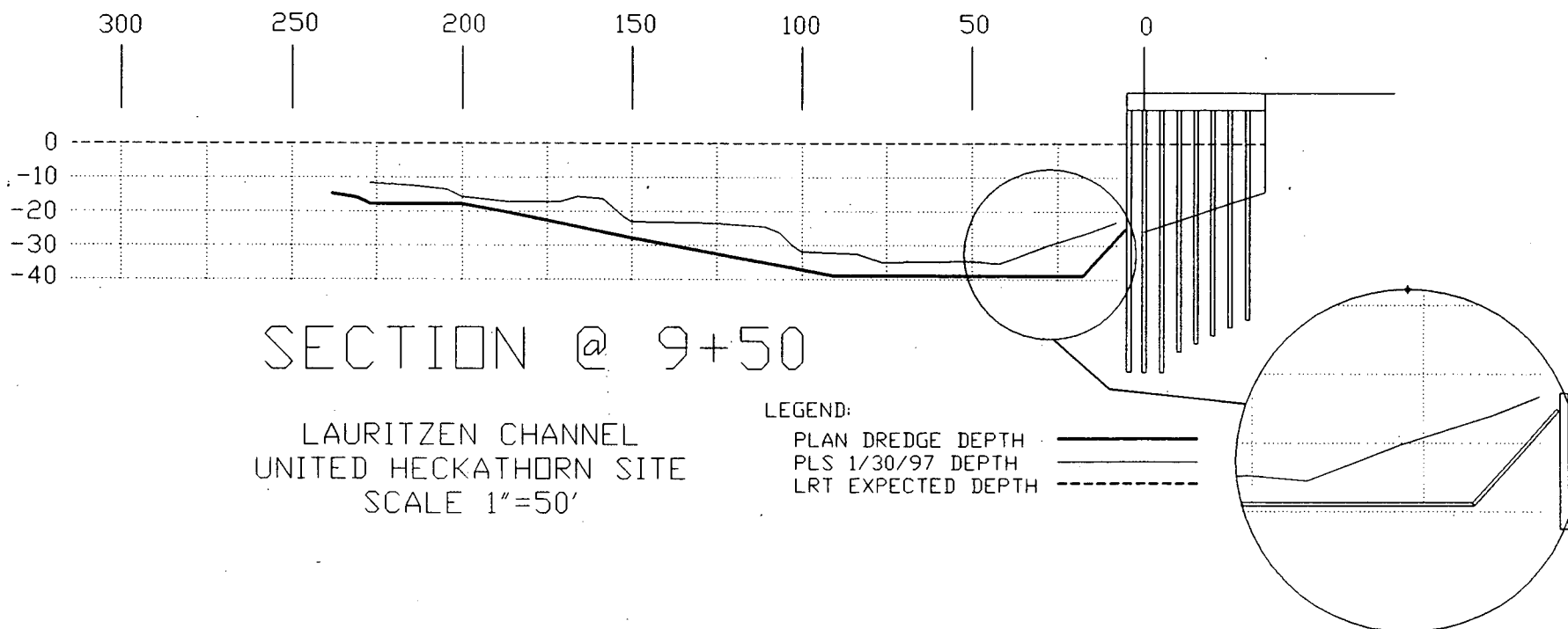
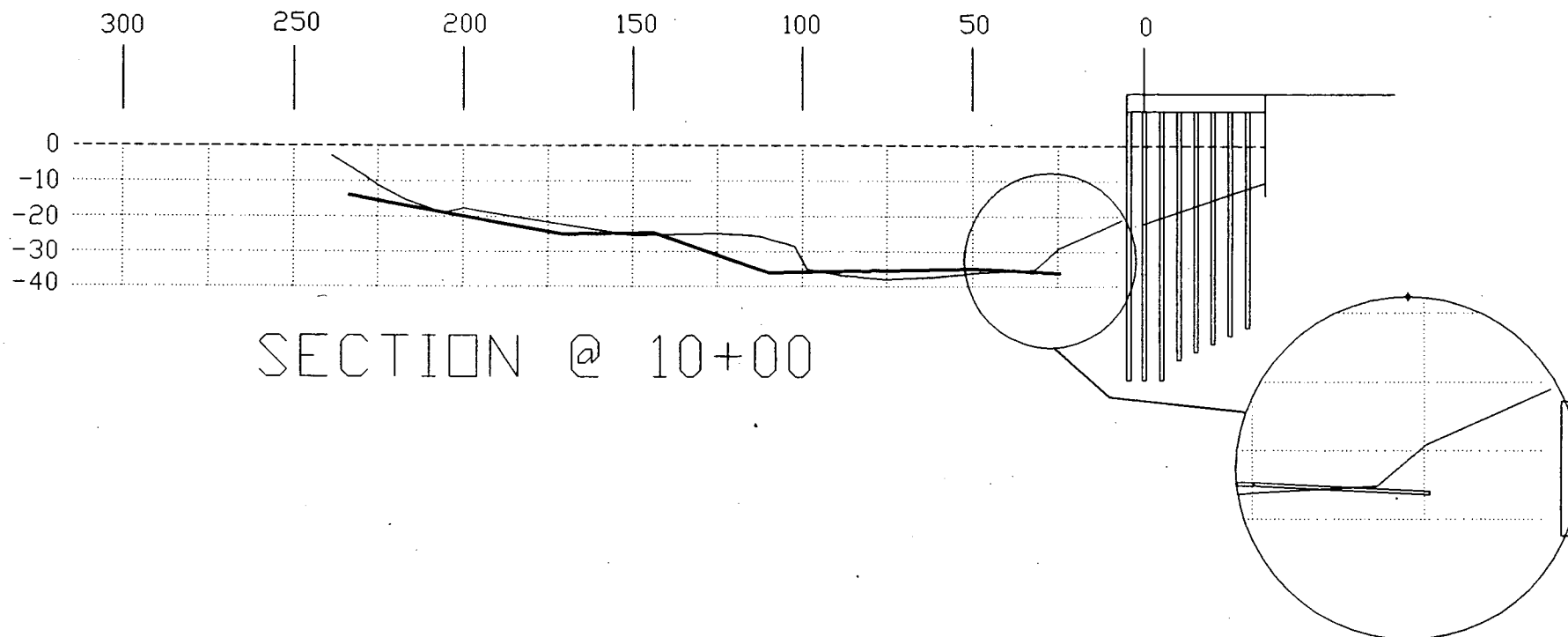
PLAN DREDGE DEPTH ———
PLS 1/30/97 DEPTH = = =
LRT EXPECTED DEPTH - - -

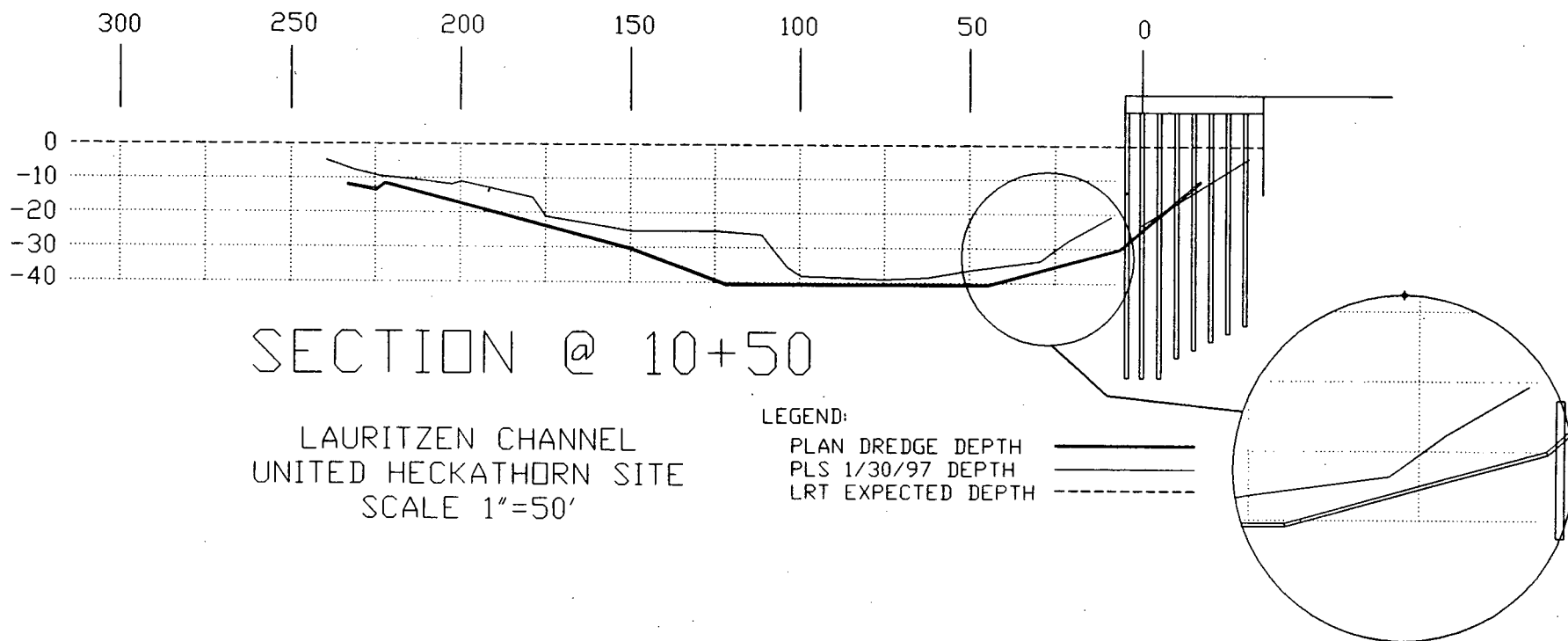
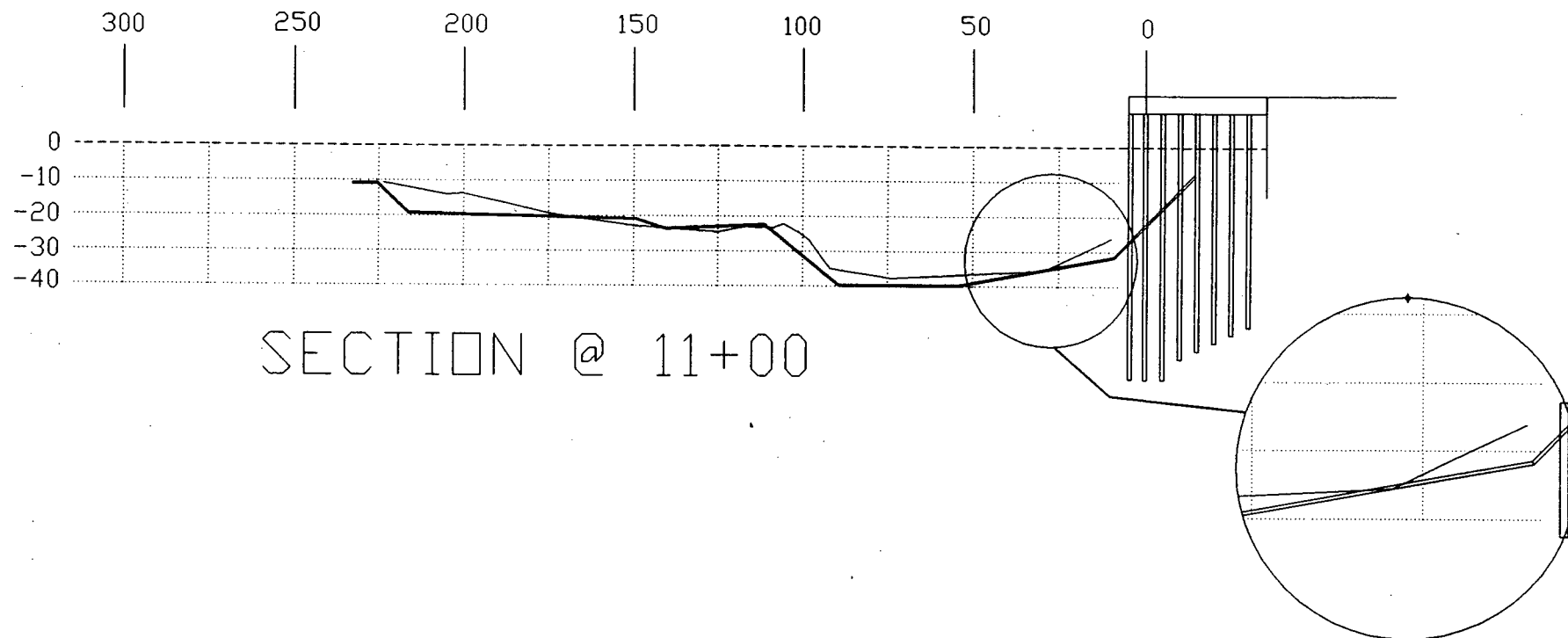


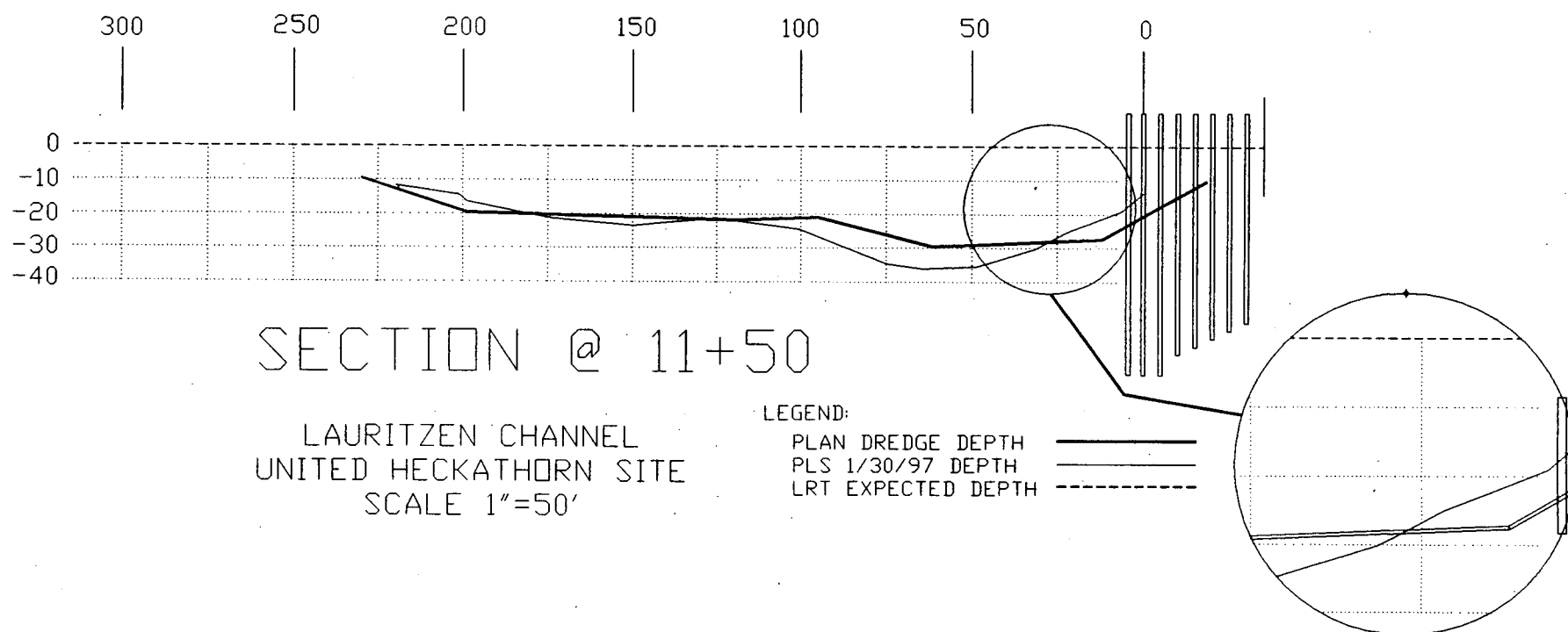
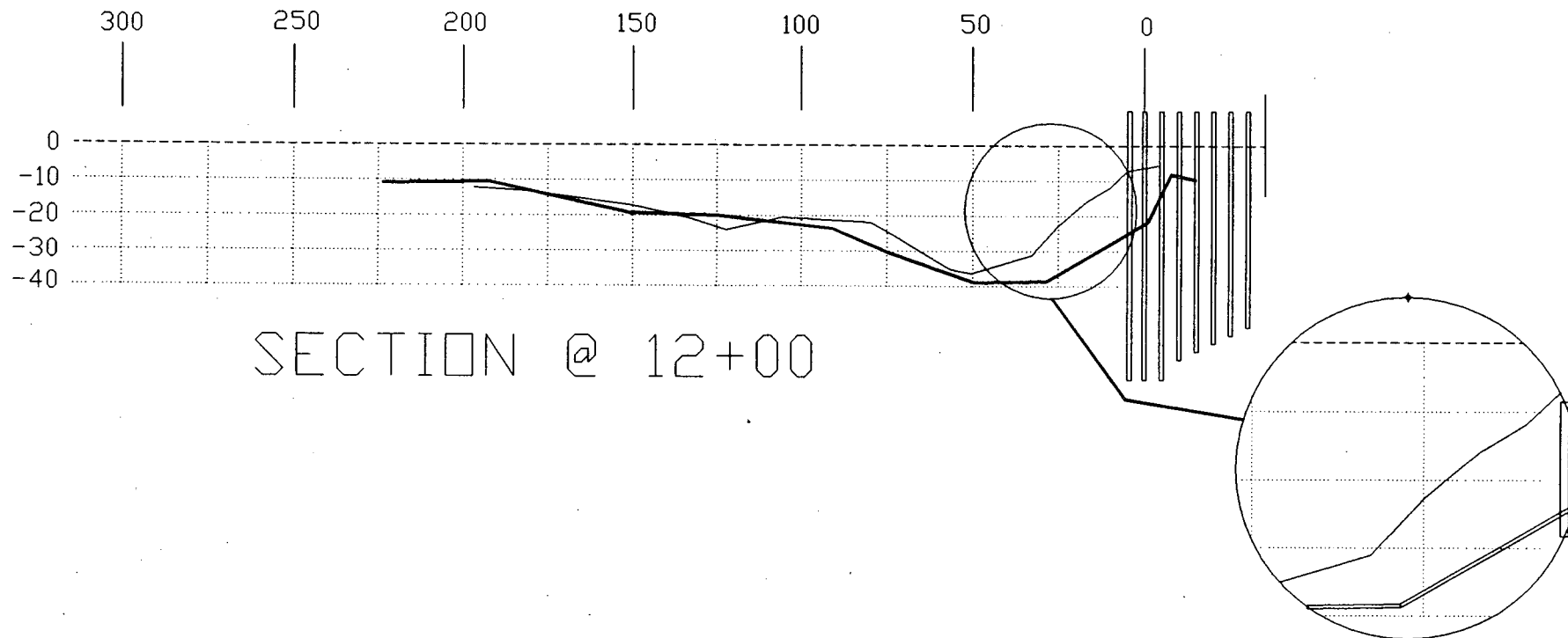


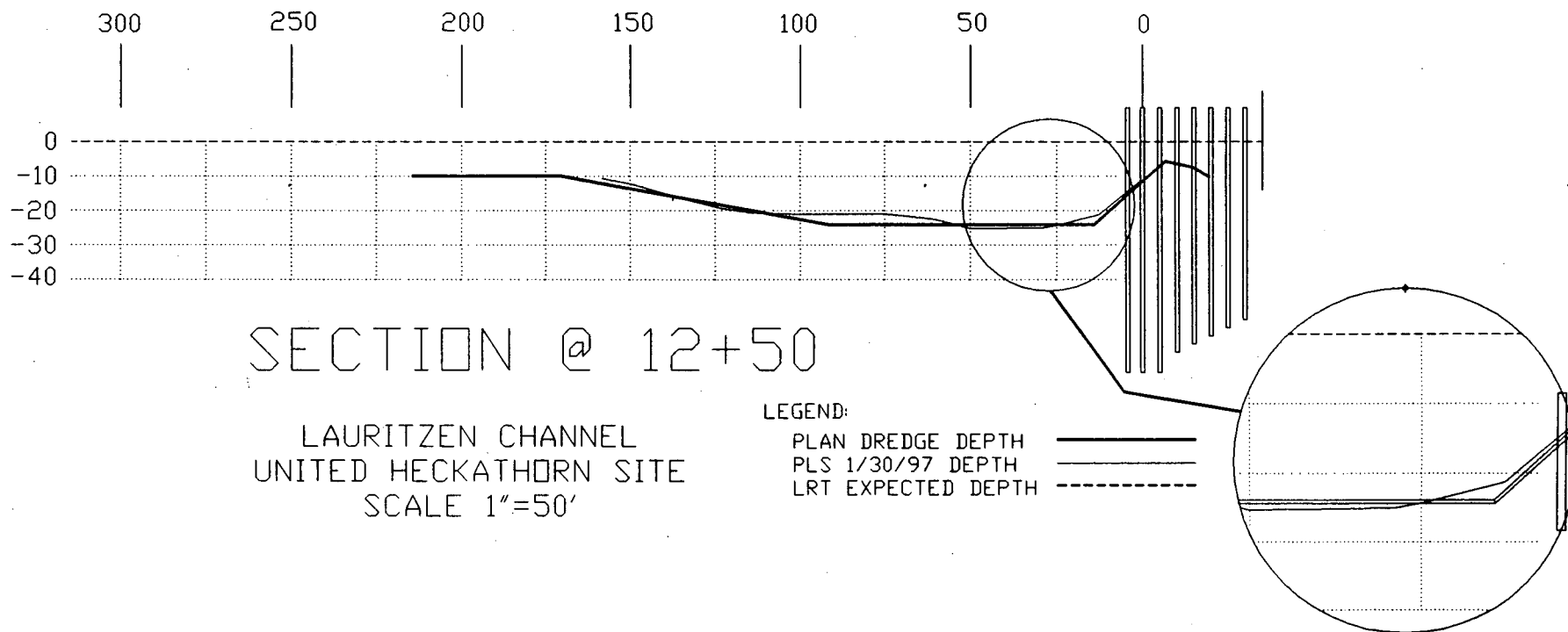
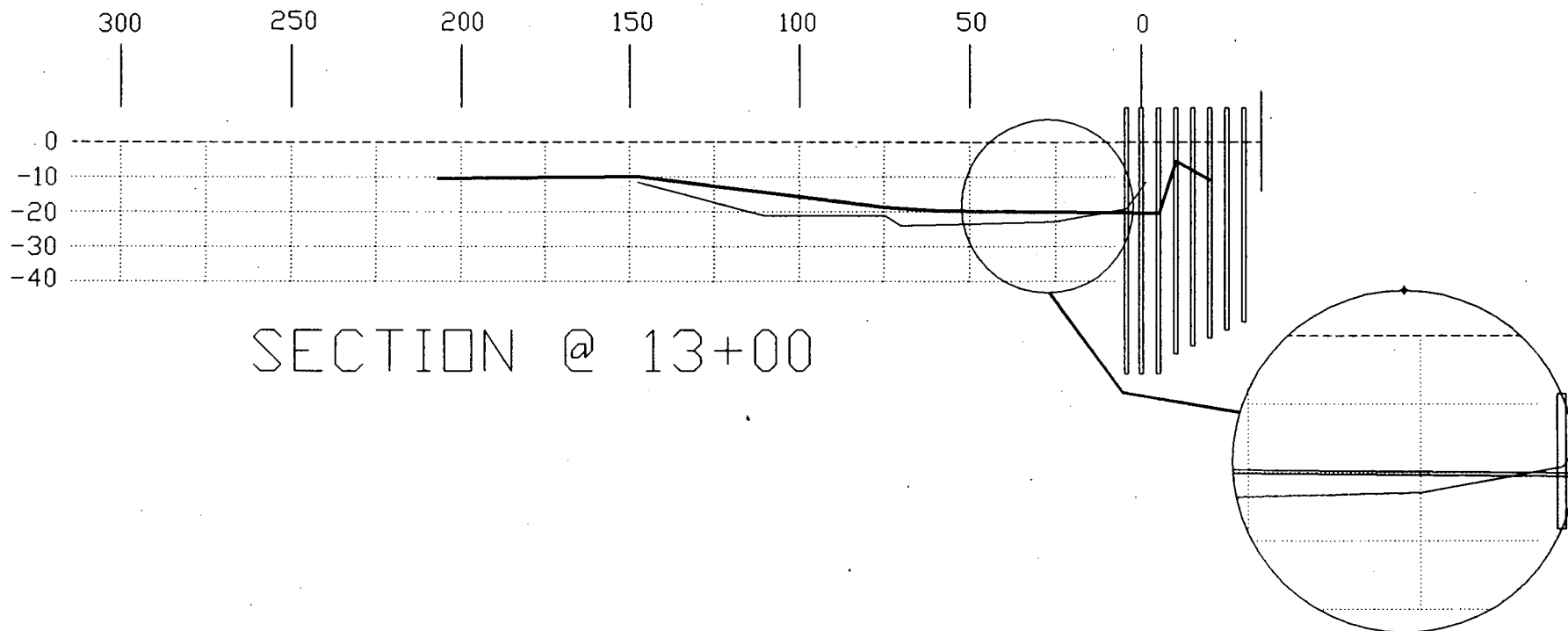


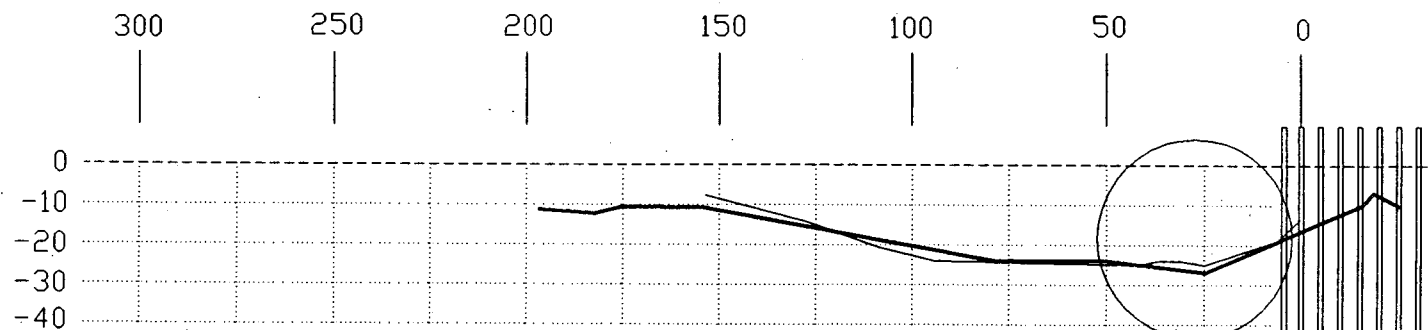




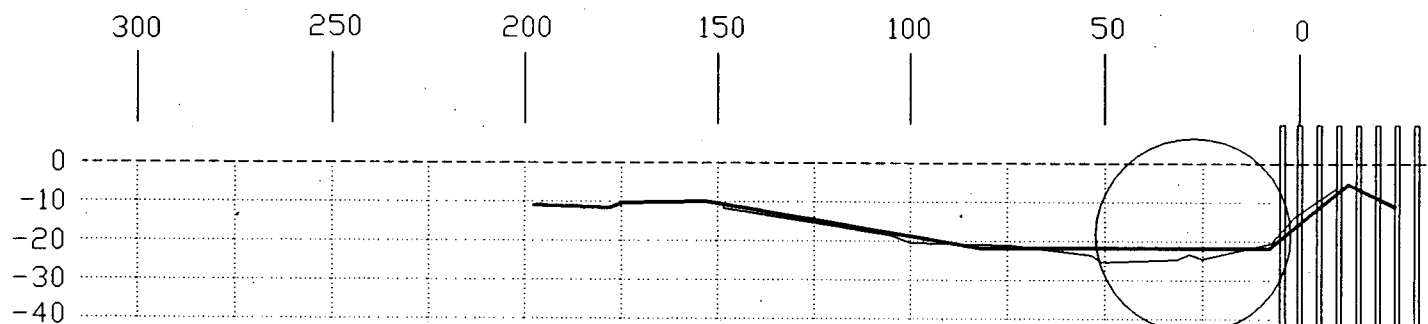








SECTION @ 14+00

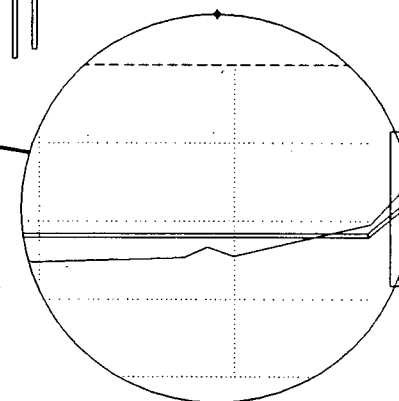
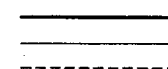


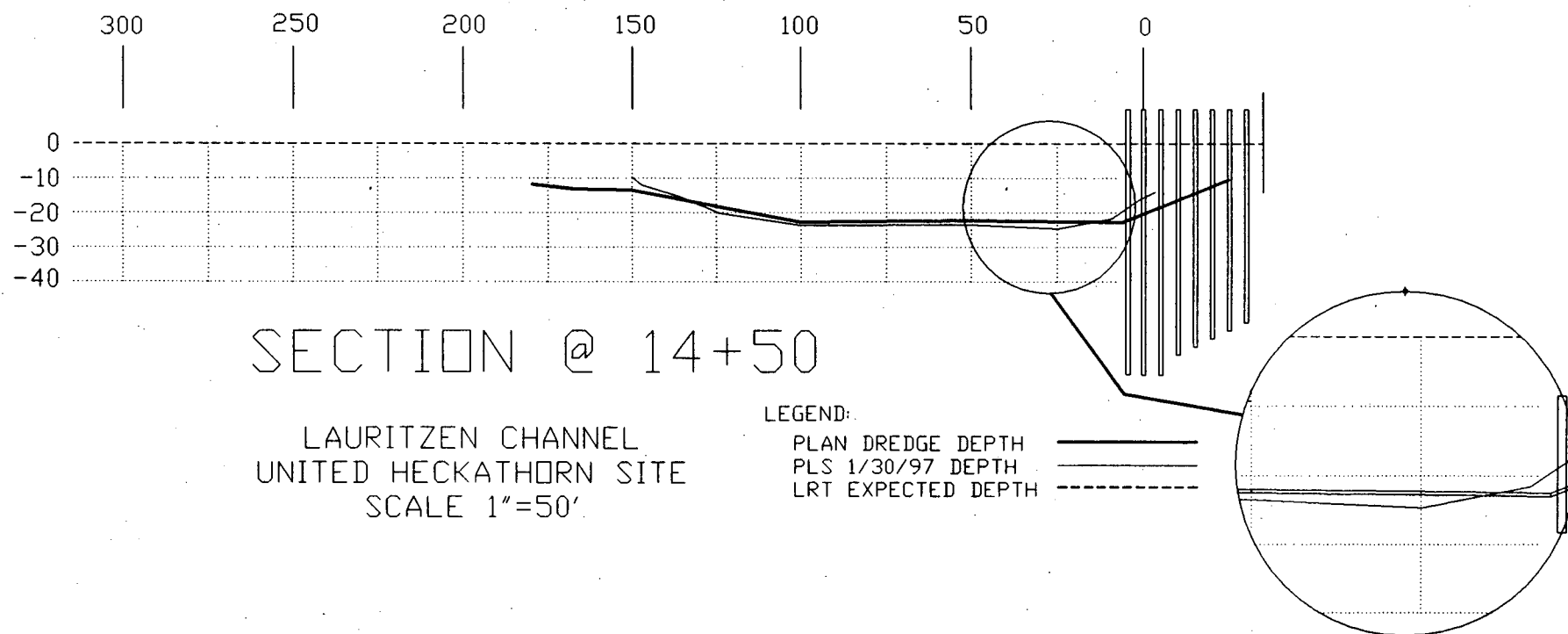
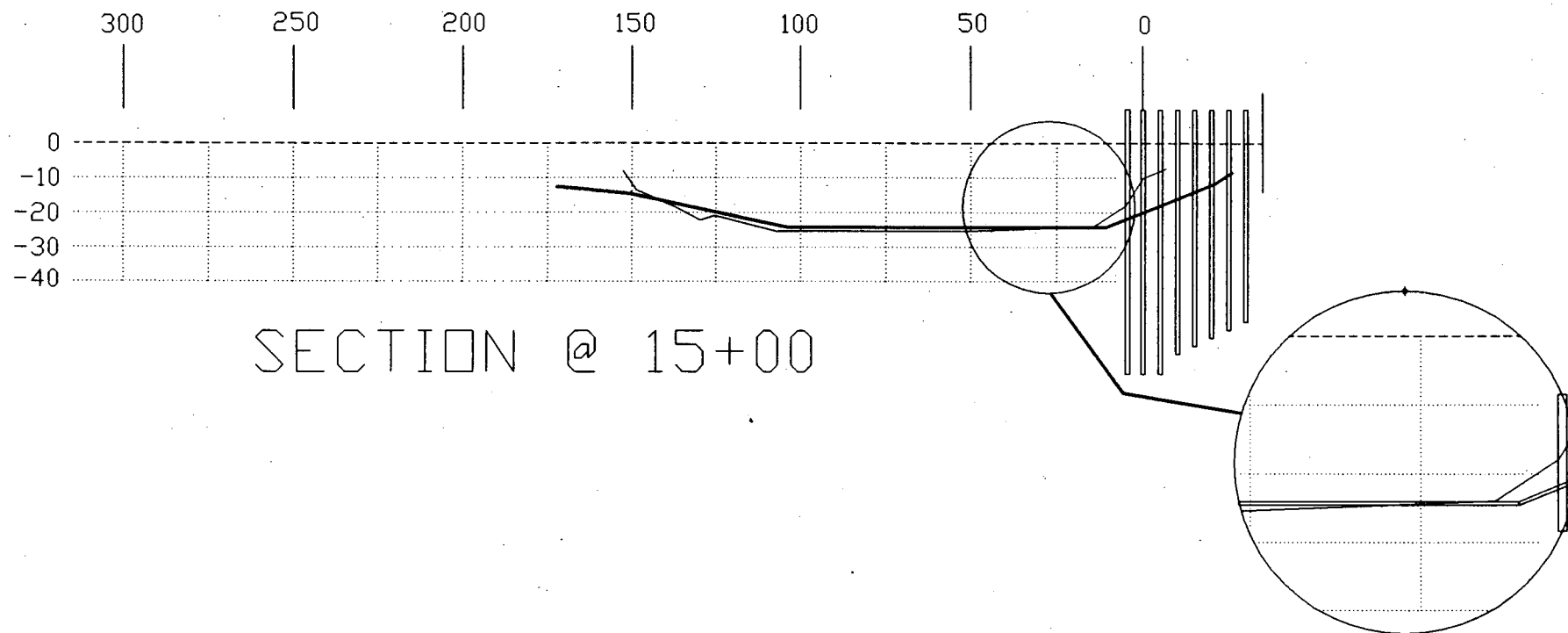
SECTION @ 13+50

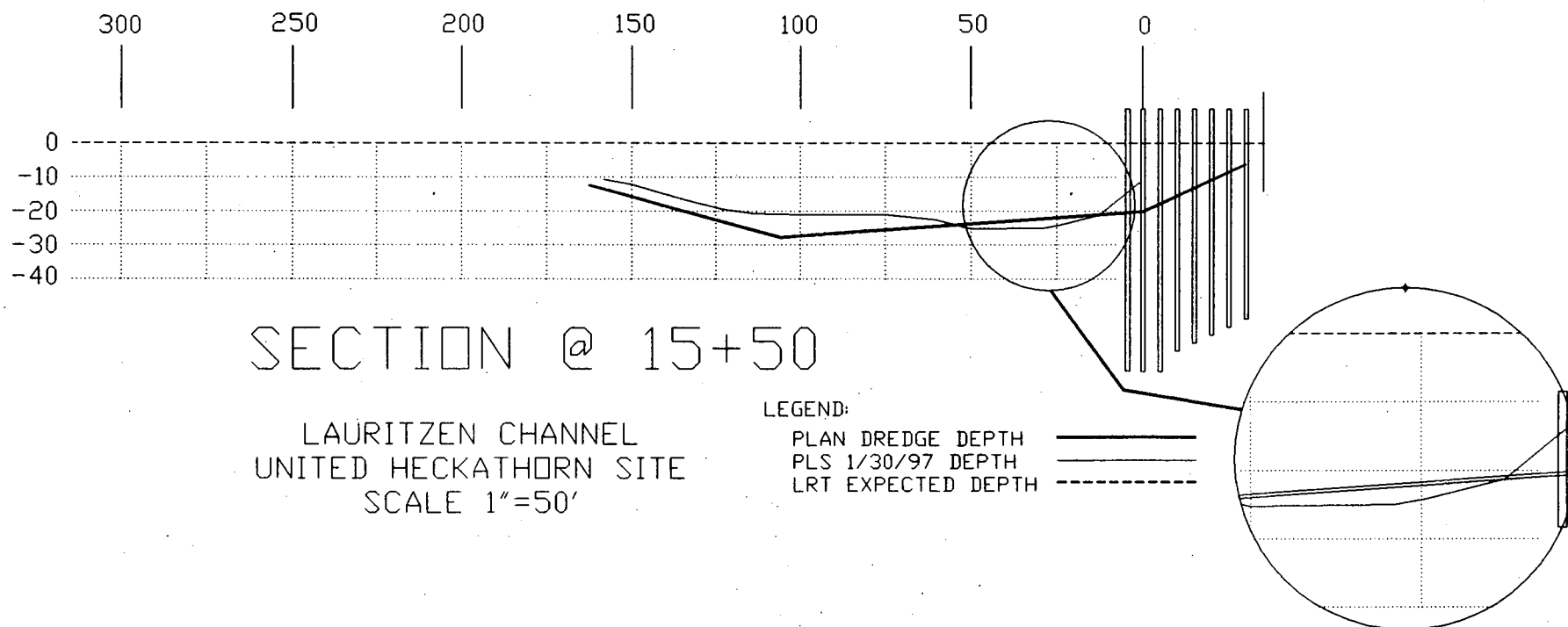
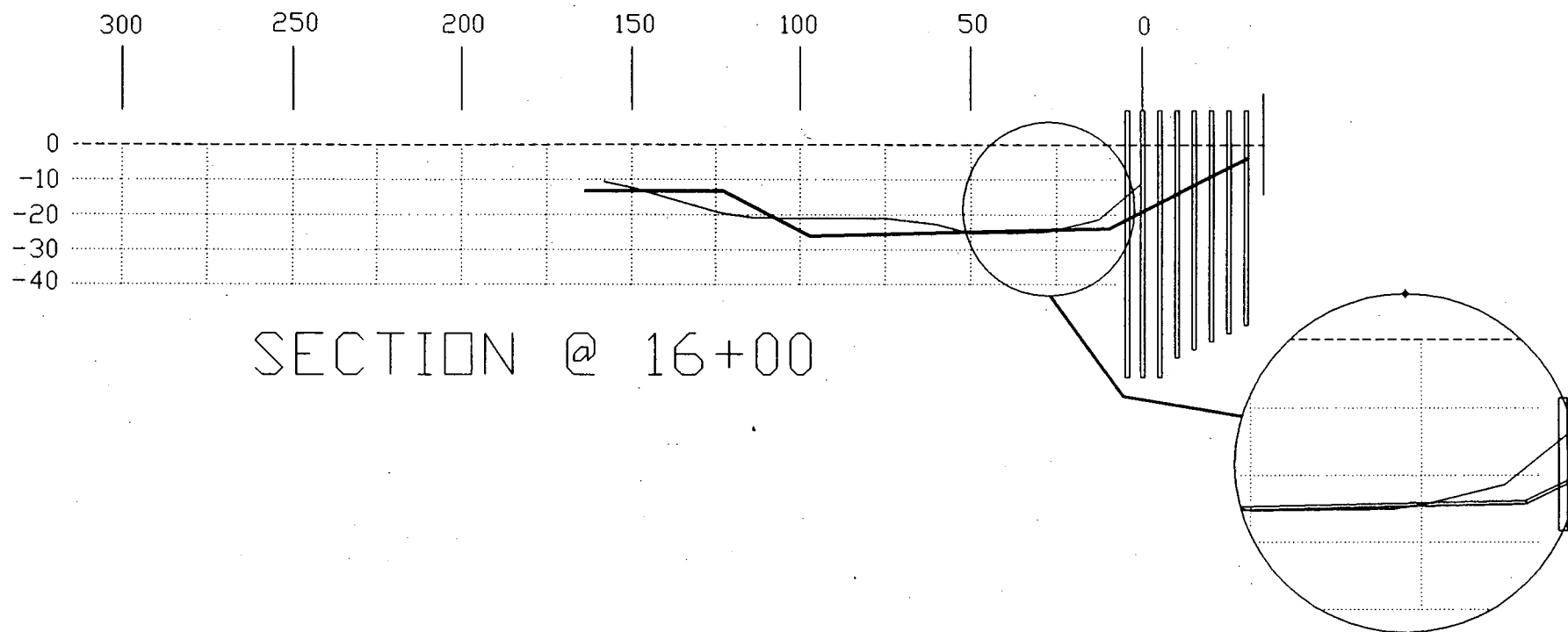
LAURITZEN CHANNEL
UNITED HECKATHORN SITE
SCALE 1"=50'

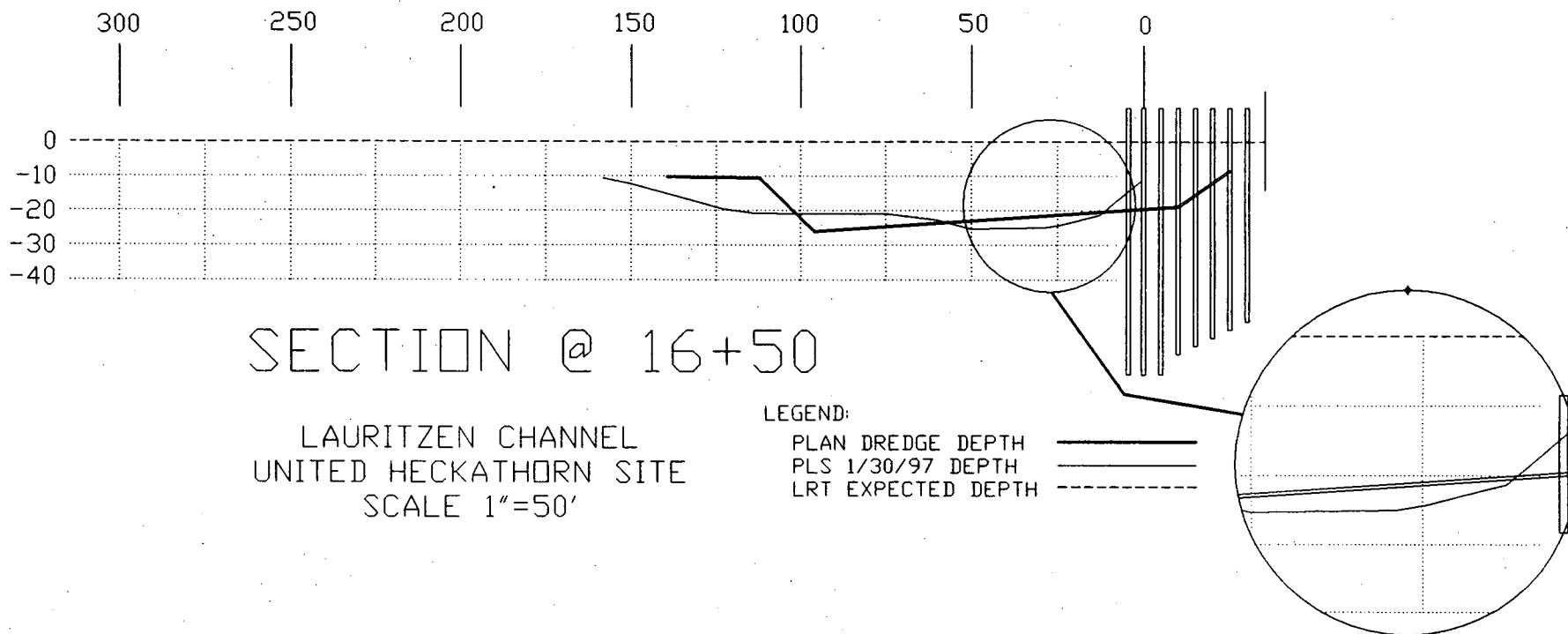
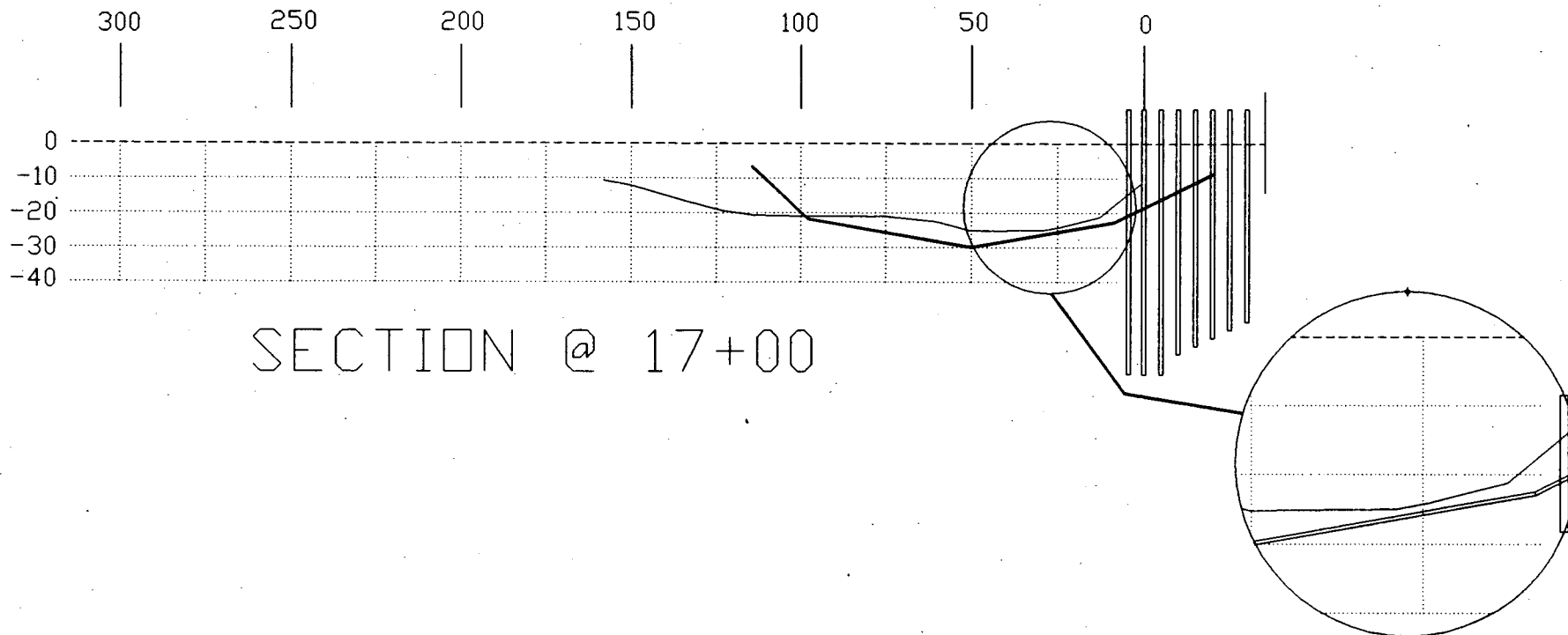
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PLAN DREDGE DEPTH
PLS 1/30/97 DEPTH
LRT EXPECTED DEPTH





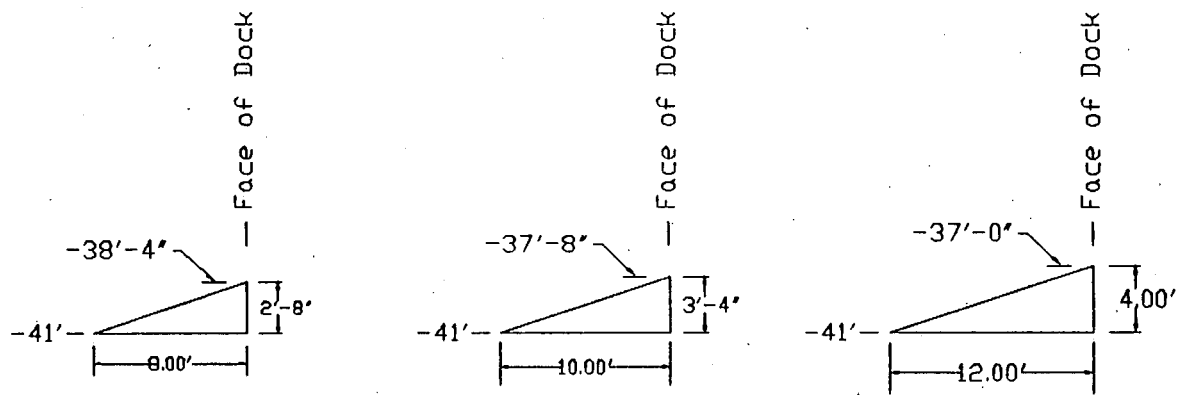




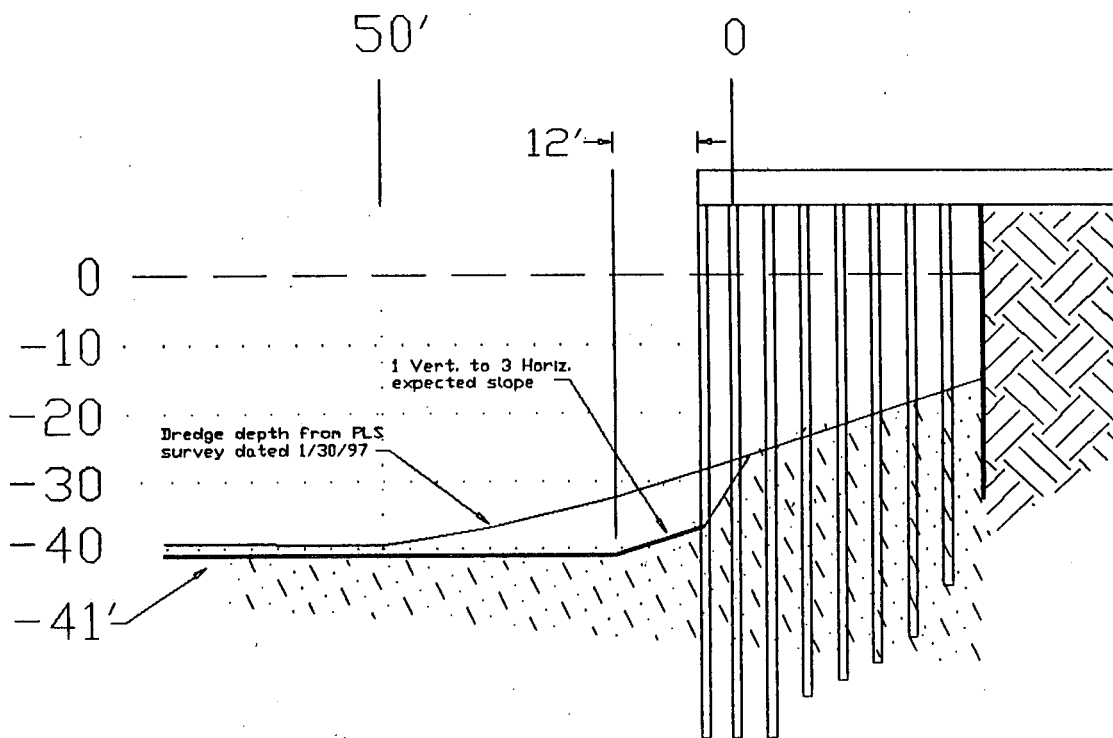
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PLS 1/30/97 DEPTH ———
LRT EXPECTED DEPTH - - - -

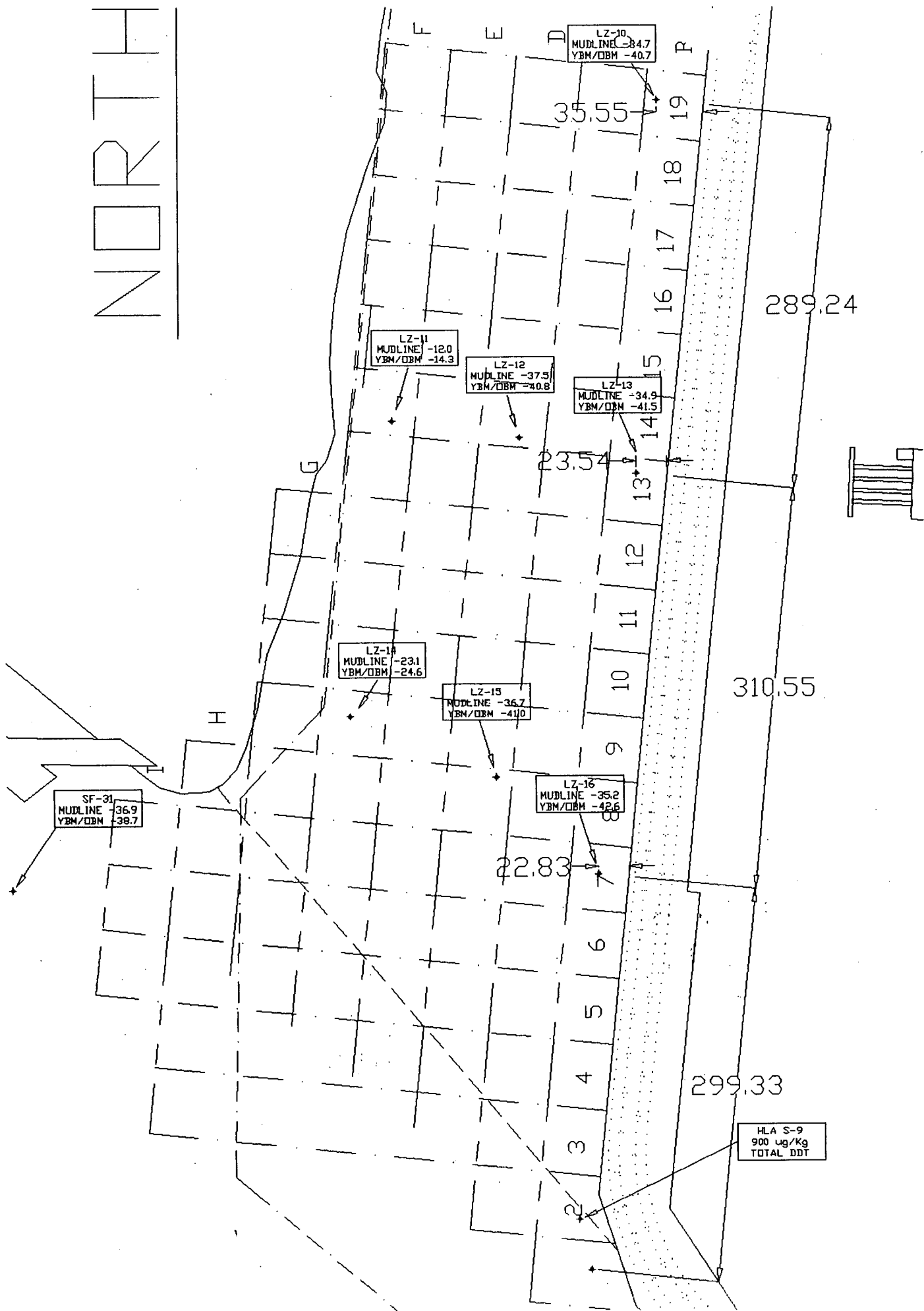


SECTIONS OF 1VERT ON 3HORIZ
WITH
RESULTING ELEVATIONS



SECTION THROUGH 8A-C

NORTH



NORTH

LZ-10
MUDLINE -34.7
YBM/OBM -40.7

35.55

289.24

LZ-11
MUDLINE -12.0
YBM/OBM -14.3

LZ-12
MUDLINE -37.5
YBM/OBM -40.8

LZ-13
MUDLINE -34.9
YBM/OBM -41.5

23.54

LZ-14
MUDLINE -23.1
YBM/OBM -24.6

LZ-15
MUDLINE -36.7
YBM/OBM -41.0

310.55

SF-31
MUDLINE -36.9
YBM/OBM -38.7

LZ-16
MUDLINE -35.2
YBM/OBM -42.6

22.83

299.33

